JAP:EAG

M-06-1151

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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IN THE MATTER OF THE
EXTRADITION OF

DORON MEROM,
also known as "Doron Marom".

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COMPLAINT AND AFFIDAVIT
IN SUPPORT OF APPLICATION
FOR ARREST WARRANT

(T. 18, U.S.C., § 3184)

EASTERN DISTRICT OF NEW YORK, SS:

I, Elizabeth A. Geddes, being duly sworn, depose and state that I am an Assistant United States Attorney for the Eastern District of New York and act for and on behalf of the Government of Israel (the "Requesting State") pursuant to the Extradition Treaty between the United States of America and Israel, signed on December 10, 1962, and entered into force on December 5, 1963, (the "Treaty," attached hereto as Exhibit A) with respect to DORON MEROM (the "fugitive").

In accordance with Title 18, United States Code, Section 3184, I charge, on information and belief, as follows:[1/]

1. Foreign charge. The fugitive DORON MEROM is duly and legally charged with having committed, in the jurisdiction of the Requesting State, crimes of Theft by Agent in violation of Section 393 of the Israeli Penal Code, 5737-1977. Article II of

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[1/] Because the purpose of this Complaint is to establish only probable cause to arrest, I have not set forth a description of all the facts and circumstances of which I am aware.

the Treaty provides that a charge for such offense shall serve as the basis for extradition.

2. Foreign arrest warrant. A warrant for the fugitive DORON MEROM's arrest was issued on July 24, 2006, by Judge Sharizli at the Tel Aviv-Jaffa Magistrates Court.

3. Facts underlying foreign charge.

a. According to an investigation by authorities of the Requesting State, the fugitive DORON MEROM stole funds that had been entrusted to him by three clients in or about and between September 1998 and October 2000.

b. In or about 1997, the fugitive DORON MEROM, a lawyer in Israel, was appointed as the guardian of a mentally incompetent woman named Maria-Rosa Margolis ("Margolis"). In or about and between November 1998 and June 1999, the fugitive DORON MEROM sold real property owned by Margolis, allegedly acting on Margolis's behalf. Thereafter, the fugitive DORON MEROM deposited the proceeds into his personal bank account and refrained from transferring the proceeds to Margolis at anytime thereafter.

c. In or about and between 1997 and 2000, the fugitive DORON MEROM represented a client named Julia Borson ("Borson") in a tort action against an insurance company. The insurance company remitted approximately $200,000 to the fugitive DORON MEROM to satisfy a judgment that had been entered in her favor. The fugitive DORON MEROM deposited the funds into his personal bank account. Only after Borson demanded that the defendant DORON MEROM turn over the funds to Borson did the fugitive DORON MEROM provide approximately half of the funds to Borson. However, the fugitive DORON MEROM refrained from ever delivering to Borson the remainder of the funds that was owed to Borson.

d. In or about 2000, the fugitive DORON MEROM represented a client named Oren Leiferman ("Leiferman"), also in a tort action against an insurance company. In or about October 2000, the insurance company remitted approximately $20,000 to the fugitive DORON MEROM to settle Leiferman's tort action. The fugitive DORON MEROM transferred the funds into his personal bank account and refrained from transferring it to Leiferman at anytime thereafter.

4. Fugitive DORON MEROM's presence in the United States. The fugitive DORON MEROM, who is within the jurisdiction of this Court, is believed to be residing in Queens, New York, based on information obtained by the Israeli Police, which includes, but is not limited to, phone records.

5. Fugitive DORON MEROM's description. The fugitive DORON MEROM, a citizen of Israel, was born on September 5, 1953 in Israel. He holds an Israeli Passport No. 8737564, which expired on March 20, 2006, and his Israeli identity number is

052005188. In August 2005, the fugitive DORON MEROM obtained status as a lawful permanent resident; his alien registration number is A98 061 227.

6. Certification of documents. The documents supporting the request for extradition, attached hereto as Exhibit B, are properly certified by the principal consular officer in Israel, in accordance with Title 18, United States Code, Section 3190, so as to enable them to be received in evidence.

7. Risk of flight. The likelihood of flight is substantial if the fugitive DORON MEROM learns of the request prior to arrest.

WHEREFORE, your complainant requests:

a. that a warrant be issued pursuant to Title 18, United States Code, Section 3184, for the fugitive DORON MEROM's arrest and that this complaint and that the warrant be placed under the seal of the court until such time as the warrant is executed;

b. that the fugitive DORON MEROM be brought before this Court "to the end that the evidence of criminality may be heard and considered";

c. that if, on such hearing, the Court deems the evidence sufficient under the provisions of the Treaty to sustain the charge, the Court certify the same to the Secretary of State in order that a warrant may be issued for the surrender of the fugitive DORON MEROM to the appropriate authorities of the Requesting State according to the Treaty; and

d. that this Court take such other actions as may be required under the provisions of the Treaty and the laws of the United States to meet the obligations of the United States under the Treaty, including the seizure of any items or materials in the fugitive DORON MEROM's possession at the time of apprehension which are related to the crimes charged or which may be used as evidence, pursuant to Article XVI of the Treaty.

ROSLYNN R. MAUSKOPF
United States Attorney

By: [signature]
Elizabeth A. Geddes
Assistant U.S. Attorney

Sworn to before me this
1st day of November, 2006

[signature]
THE ... LEVY
UNI ... 'E JUDGE
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